IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

SOUTHERN DISTRICT OF MISSISSIPPI FILED

BCT 22 2019

ARTHLE JOHNSTON DEPUTY

LATOYA BROWN; et al

PLAINTIFFS

v.

CAUSE NO. 3:17cv347-CWR-LRA

MADISON COUNTY, MISSISSIPPI; et al

DEFENDANTS

AGREED FINAL JUDGMENT OF DISMSISAL WITH PREJUDICE AS TO DAMAGES CLAIMS BY KHADAFY MANNING AND QUINNETTA THOMAS MANNING ONLY

THIS CAUSE has come before the Court on the joint *ore tenus* motion of Plaintiffs, Khadafy Manning and Quinnetta Thomas Manning, by and through their counsel of record, and Defendants, Madison County, Mississippi, Sheriff Randall S. Tucker, and Deputy Sheriff Slade Moore, by and through their counsel of record, as these parties have announced the mutual desire that these Plaintiffs' claims for compensatory damages, punitive damages, and attorneys' fees, costs and defenses be dismissed with prejudice. The Court, being fully advised in the premises, finds that the request should be granted pursuant to FED. R. CIV. P. 41(a)(2).

IT IS, THEREFORE, ORDERED AND ADJUDGED that any and all claims for damages that were or could have been filed by Plaintiffs, Khadafy Manning and Quinnetta Thomas Manning, against Madison County, Mississippi, Sheriff Randall S. Tucker, and Deputy Sheriff Slade Moore are hereby dismissed with prejudice, with each party to bear their own fees, costs and expenses. The Court further finds that pursuant to FED. R. CIV. P. 54(b), there is no just reason for delay and expressly directs entry of a Final Judgment dismissing with prejudice the claims for damages alleged by Khadafy Manning and Quinnetta Thomas Manning.

IT IS FURTHER ORDERED AND ADJUDGED that no claims for declaratory relief or injunctive relief alleged by any Plaintiff or related to the Consent Decree entered in this action are dismissed as a result of this Agreed Final Judgment.

SO ORDERED AND ADJUDGED, this the

, 2019.

UNITED STATES DISTRICT JUDGE

AGREED AND REQUESTED BY:

By:

/s/ Joshua Tom

Joshua Tom

AMERICAN CIVIL LIBERTIES UNION OF MISSISSIPPI FOUNDATION Joshua Tom (MSB #105392) 233 East Capitol Street Jackson, MS 39201 (601) 354-3408 JTom@aclu-ms.org

AMERICAN CIVIL LIBERTIES UNION FOUNDATION
Ezekiel Edwards (pro hac vice)
125 Broad Street
New York, NY 10004
(212) 549-2610
eedwards@aclu.org

SIMPSON THACHER & BARTLETT LLP Jonathan K. Youngwood (pro hac vice) Janet A. Gochman (pro hac vice) Isaac Rethy (pro hac vice) Kavitha S. Sivashanker (pro hac vice) Nihara K. Choudhri (pro hac vice) Brooke Jarrett (pro hac vice) 425 Lexington Avenue New York, NY 10017 (212) 455-2000 jyoungwood@stblaw.com jgochman@stblaw.com irethy@stblaw.com kavitha.sivashanker@stblaw.com nchoudhri@stblaw.com bonnie.jarrett@stblaw.com

Attorneys for Plaintiffs, Khadafy Manning & Quinnetta Thomas Manning

By: /s/ Michael B. Wallace

Michael B. Wallace

WISE CARTER CHILD & CARAWAY, P.A.

Michael B. Wallace (MSB #6904) Charles E. Ross (MSB #5683) James E. Graves (MSB #102252) Charles E. Cowan (MSB #104478)

Post Office Box 651

Jackson, Mississippi 39205-0651

Telephone: 601-968-5534
Facsimile: 601-944-7738
mbw@wisecarter.com
cer@wisecarter.com
jeg@wisecarter.com
cec@wisecarter.com

KATIE BRYANT SNELL, PLLC Katie Bryant Snell (MSB #103607)

P.O. Box 3007

Madison, Mississippi 39130-3007

Telephone: 601-460-9800 katie@katiebryantsnell.com

CURRIE JOHNSON & MYERS, P.A.

Rebecca B. Cowan (MSB #7735)

1044 River Oaks Dr. Jackson, MS 39232 P.O. Box 750

Jackson, Mississippi 39205-0750

Telephone: 601-969-1010 Facsimile: 601-969-5120 bcowan@curriejohnson.com

PETTIS, BARFIELD & HESTER, P.A.

J. Lawson Hester (MSB #2394) Jason E. Dare (MSB # 100973) 4450 Old Canton Road, Suite 210

Jackson, Mississippi 39211 Telephone: 601-987-5300 Facsimile: 601-987-5353 lhester@pbhfirm.com jdare@phhfirm.com

Attorneys for Defendants, Madison County, Mississippi; Sheriff Randall S. Tucker; and Slade Moore